



REPLY TO
ATTENTION OF

AERPE-S

DEPARTMENT OF THE ARMY
HEADQUARTERS, 21ST THEATER SUPPORT COMMAND
UNIT 23203
APO AE 09263

15 September 2003

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: 21st Theater Support Command Policy Letter 13, Safety

1. References:

- a. AR 385-10, The Army Safety Program, 29 Feb 00.
- b. AR 385-55, Prevention of Motor Vehicle Accidents, 12 Mar 97.
- c. 21st TSC Circular 385-01, Safety and Occupational Health Program, 1 Feb 01.
- d. Army in Europe Command Policy Letter Number 3, Safety, 4 May 2003.

2. I am the 21st Theater Support Command (TSC) Safety Officer. The Command Sergeant Major is the 21st TSC Safety Noncommissioned Officer. This is a role we take very seriously. Safety will be the first priority in mission accomplishment throughout the 21st TSC.

3. Leaders at all levels will foster a command climate that emphasizes safety and encourages pro-active safety attitudes. Accident prevention is every commander's responsibility. I expect you to eliminate anything that endangers soldiers, civilians, or families in the command. Do not put your soldiers or civilians at risk in a shortsighted decision process. All commanders will ensure safe training, safe military vehicle operations, mission planning, enforcement of standards, and acceptable risk management through the risk assessment process. I expect you to implement risk assessments down to the lowest supervisor level and make written risk mitigation decisions to prevent injuries in your unit (Encl 1). The risk assessment matrix will be used when evaluating risk (Encl 2). Each commander will ensure that all personnel within the command are aware of risks we face and what those risks are (Encl 3). Leaders will ensure safe vehicle dispatch procedures are followed (Encl 4).

4. Privately Owned Vehicle (POV) accidents remain the Army's number one cause of death and serious injuries. All POVs will be inspected semi-annually, prior to the Memorial Day and Thanksgiving weekends. Commanders will be familiar and comply with the Army Six Point POV Accident Prevention Program. Commanders will ensure that high risk and extremely high risk soldiers complete safety risk assessments when leaving for extended

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weekend passes or annual leave (Encl 5). Commanders will ensure that every assigned soldier and civilian is briefed on any known local and seasonal driving hazards. Brigade commanders will inform me of all fatal POV accidents within 30 minutes of their notification and present me with an assessment to include what happened, why it happened, how it could have been prevented, and implemented corrective measures upon completion of the accident investigation.

5. Commanders will enforce the use of required Personal Protective Clothing and Equipment. Commanders will direct the wearing of a reflective safety belt with the Battle Dress Uniform (BDU) and the Army Physical Fitness Uniform (PFU). The reflective belt will be worn with the BDU during industrial operations in periods of low visibility while in non-hostile environments. The reflective belt will be worn with the PFU at all times (day or night) in such a manner as to be plainly visible. Reflective belts are not required on the BDU or PFU indoors. A reflective vest may be worn in lieu of a reflective belt if required due to certain operations/locations.

6. Commanders will enforce the use of retro-reflective delineators on all tactical vehicles. Retro-reflective delineators greatly improve vehicle visibility, especially at night, and thereby prevent rear end collisions. All 21st TSC tactical vehicles must have serviceable delineators installed. Any 21st TSC tactical vehicle without serviceable delineators will be deadlined until delineators are properly installed/cleaned.

7. The point of contact is the Command Safety Director, 484-7317.

8. FIRST IN SUPPORT!



BENNIE E. WILLAMS
Major General, USA
Commanding

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A (21st TSC Cir 25-30)

RISK MANAGEMENT

1. References:

- a. FM 100-14, Risk Management, 23 Apr 98.
- b. Public Law 91-596, The Occupational Safety and Health Act, 29 Dec 70.

2. Risk management is the Army's five-step risk mitigation process for identifying and controlling safety and health hazards. The Army Risk Management Process must not be used to circumvent compliance with existing safety or health standards and regulations.

3. Risk management in the 21st Theater Support Command (TSC) is leadership at the appropriate level of authority making an informed decision to mitigate risks and then accept residual risks in writing. I expect leaders at all levels to ensure that risk mitigation (addressing all safety and occupational health concerns) is integrated in all workplaces, tasks, and operations performed by their military and civilian personnel.

4. Risk mitigation in the 21st TSC begins with the planning phase of an operation to ensure the risk to personnel and equipment is minimized before the operation starts. For static locations (administrative offices, maintenance shops, storage facilities, etc.), written workplace hazard assessments prepared in accordance with the Occupational Safety and Health Act, sections 1910.132-1910.139 will be used as long as they are current, reviewed, and signed annually.

5. Since the risk management process is cyclic, once it is applied to a regular task or mission, completion of new written risk management worksheets is required only if new hazards or control measures are identified. For example, once the risk management process is applied to driving from point A to point B, further formal risk management is not needed unless new hazards or control measures were identified.

6. The risk mitigation decision making process will be documented on the worksheet at Enclosure 2. To minimize the frequency of performing formal risk assessments, leaders will conduct thorough risk assessments in the beginning. The more hazards that are identified and controlled initially, the fewer changes there will be later.

7. A risk level is not reduced until controls are implemented. The single highest risk level (after implementation of controls) defines the risk of the overall operation. A risk assessment matrix with 21st TSC approval authorities for various risk levels is at Enclosure 2. Copies of all completed/signed risk management worksheets for medium or higher risk operations will be sent through command channels to the Command Safety Office where they will be reviewed and maintained on file.

(Encl 1)

RISK ASSESSMENT MATRIX

	HAZARD PROBABILITY				
EFFECT	FREQUENT	LIKELY	OCCASIONAL	SELDOM	UNLIKELY
CATASTROPHIC	EXTREMELY HIGH	EXTREMELY HIGH	HIGH	HIGH	MEDIUM
CRITICAL	EXTREMELY HIGH	HIGH	HIGH	MEDIUM	LOW
MODERATE	HIGH	MEDIUM	MEDIUM	LOW	LOW
NEGLIGIBLE	MEDIUM	LOW	LOW	LOW	LOW

EFFECT

CATISTROPHIC...Death or permanent total disability or major property damage (e.g., class A).

CRITICAL.....Permanent partial disability; temporary (3 months or more) total disability; major system damage; significant property damage (e.g., class B).

MODERATE.....Lost workday injury or illness; minor property damage (e.g., class C)

NEGLIGABLE.....First aid or minor supportive medical treatment, minor damage (e.g., class D)

PROBABILITY (over time)

FREQUENT.....May occur often - Many people exposed.

LIKELY.....May occur several times - Several people exposed

OCCASIONAL.....May be expected to occur - Multiple (5-10) people exposed

SELDOM.....May be possible - Few people exposed.

UNLIKELY.....Possible, but improbable – One or two people exposed.

The above guidance may not always apply, but should aid in determining the correct level of risk.

A general rule of thumb is - The more people that are at risk/the more often an operation is performed, the higher the risk will be.

21st TSC Risk Approval Authority Chart

Risk Level

Approval Authority

Low

Company/Detachment Commander,
Operation OIC, Task Force Commander

Medium

Battalion Commander (may be
delegated to Company Commander)

High

Brigade Commander

Extremely High

Commanding General, 21st TSC

(Minimum approval authorities – a higher level may retain authority to approve)

(Encl 2)

WHERE WE ARE AT RISK-AN ANALYSIS

Statistics show that soldiers in the ranks of private through specialist and between the ages 18 to 25 have most of our accidents. Privately owned vehicle (POV) accidents account for most of our fatalities. Leaders at every echelon must know who in their areas of operation is involved in accidents, where these accidents occur, and under what circumstances.

Leaders must get in the cockpit, the crew compartment, and the hearts and minds of our soldiers, civilians, and family members. We must take extensive measures to ensure that our training, certification, and licensing programs are effective and clearly understood. Leaders must continue to ensure that the licensing and supervision of personnel operating tactical and nontactical vehicles and driving POVs are strictly according to established standards.

The following is a summary of the causes of frequently occurring accidents:

On-Duty Vehicle Operations

- Speed: Failure of senior occupants to know and enforce speed limits.
- Mission approval and mission briefings: Failure by leaders to properly brief drivers, inadequate planning, complacency, and failure to follow established procedures.
- Seatbelt use: Failure to enforce proper use of seatbelts and leaders not setting the example.
- Fatigue: Lack of consideration of the time of operation or extended duty.
- Indiscipline: Not following established procedures (for example, observing the speed limit, carrying out preventive maintenance checks and services, following proper dispatch procedures).
- Risk management: Failure to reduce risk when mission conditions change.

Off-Duty Vehicle Operations

- Speed: Excessive speed for conditions, traffic, weather, or experience level.
- Seatbelt use: Failure to use seatbelts (a major factor in reducing fatalities).
- Fatigue: Weekend trips at extended distances, late-night returns, and poor trip planning.
- Alcohol: Driving while under the influence.
- Improper passing: Violating the rules of the road or driving too fast for conditions.

Soldier Activities

- Bivouac: Failure to designate safe sleeping areas and restrict vehicle traffic. Failure to use only authorized vented heaters and take fire-prevention precautions in tents and structures.
- Convoy operations: Failure to ensure that convoy standards are briefed, understood, and followed.
- Deployment operations: Failure to properly assess risks and follow standards in AE Pamphlet 385-15.
- Night-vision-goggle operations and training: Failure to operate according to the "crawl-walk-run" philosophy. Failure to ensure that soldiers are trained and proficient.
- Rail operations: Failure to ensure that rail-operations standards in AE Pamphlets 385-15 and 385-15-2 are briefed, understood, and followed, and failure to comply with the prohibition against climbing on railcars or loaded equipment after the equipment is loaded, during transit, and before the equipment is unloaded.

Aviation

- Striking objects: Striking trees and wires, lack of night-vision acuity, and poor crew coordination and cross checking.
- Standards: Failure to follow published procedures or practice "mission ownership."
- Complacency or lack of attention to detail: Errors by the air mission commander, instructor pilot, and pilot in command.

(Encl 3)

SAFETY AND DISPATCH OF MILITARY VEHICLES

1. References:

a. AR 600-55, The Army Driver and Operator Standardization Program (Selection, Training, Testing, and Licensing), 31 December 1993.

b. AE Regulation 600-55, Driver- and Operator-Standardization Program, 24 July 2003.

c. USAREUR Regulation 385-55, Prevention of Motor Vehicle Accidents, 26 January 2000.

2. Our accident history shows that vehicle accidents account for a significant part of our safety risk. Commanders will give special attention to the safety and welfare of soldiers involved in tactical and non-tactical military vehicle operations. Commanders will--

a. Ensure military vehicle operators are--

(1) Selected, trained, tested, and have signed drivers licenses according to references 1a and b. The battalion commander is the licensing authority.

(2) Certified by a qualified driver instructor who is licensed for the equipment being tested and trained to perform all tasks associated with the mission.

(3) Provided remedial and annual skill-sustainment training and testing according to references 1a and b.

b. Conduct risk assessments according to Attachment 1 and according to the mission, enemy, terrain, troops, and time available (METT-T) before beginning an operation involving combat and tactical military vehicles. Take steps to minimize risks.

c. Ensure that military vehicles are not dispatched singularly or in convoys without a noncommissioned officer in charge (NCOIC). When the mission NCOIC has a specialty (for example, observer/controller), the commander will determine whether or not testing-certification is appropriate. Dispatching military vehicles without an NCOIC requires the personal approval of the commander, who will base the decision on a mission risk assessment. When dispatching vehicles assigned to administrative units such as staff offices, or when dispatching nontactical vehicles, the commander is authorized to dispatch the vehicle without an NCOIC, but only after conducting a risk assessment according to attachment 1.

d. Ensure that all vehicles have working seatbelts and that personnel use them whenever operating or riding in vehicles. Commanders will administratively "deadline" vehicles without seatbelts.

e. Ensure that appropriate records and licenses are maintained and managed according to the references in paragraph 1.

(Encl 4)

Vehicle Operation Risk Assessment

1. References:

- a. AR 100-14, Risk Management, 23 April 1998.
 - b. Memorandum, HQ USAREUR/7A, AEAGA-S, 5 Mar 03, subject: Risk Assessment Tools for Preventing Accidents.
2. Risk assessments will be provided for all vehicle missions involving US military and civilian drivers (requirements for completion of risk assessments involving local national vehicle operators must be coordinated with works council before a policy can be implemented). Completed risk assessments will be signed by the vehicle operator and the supervisor/releaser authorizing the mission. Approvers of completed risk assessments will keep copies on file for 7 days after completion of the mission.
3. A sample risk assessment is included in this enclosure. Units are encouraged to add to this form, if necessary, to better tailor it to their specific needs. Units already conducting daily risk assessments are authorized to continue using the currently used tools as long as these tools cover, as a minimum, the same areas as the risk assessment in this enclosure.
4. For routine missions. Preparing daily written risk assessments may not be practical. In these cases, brigade commanders may grant written exceptions. All exceptions will include a comprehensive written risk assessment for the routine mission, control measures to implement for potential hazards (e.g. rain, snow, road construction, mechanical failure, etc.), and a requirement to perform a mission brief with the driver prior to dispatch covering expected hazards for the particular mission. Brigades will submit a copy of all granted exceptions to the Command Safety Office.

(Attachment 1)

Vehicle Operation Risk Assessment Tool

(Circle the appropriate categories and corresponding points)

Driver's Sex:	Male	(5 Points)	
Driver's Age:	< 19 or 34 – 38 yrs	(3 Points)	
	20 – 23 yrs	(6 Points)	
	24 - 28 yrs	(5 Points)	
	29-33 yrs	(4 Points)	
Driver's Grade:	E1, E8-E9, W1, W2, 01	(3 Points)	Driver's Name/Rank: _____
	E2, O2, E6 – E7	(4 Points)	Driver's Signature: _____
	E3, E5	(5 Points)	Furthest Destination: _____
	E4	(6 Points)	Date of Departure: _____
Driving Record:	DUI	(17 Points)	Mission: _____
	Accident at-fault	(12 Points)	
	Reckless Driving/Speeding (Over 20 MPH)	(7 Points)	
	Moving violation/Speeding (Over 10 MPH)	(3 Points)	
Personnel Concerns:	Stress or serious personal problems	(12 Points)	
	Alcohol or drug abuse	(15 Points)	
	Taking medication affecting ability to drive	(10 Points)	
Driving Skills:	1-3 years experience	(3 Points)	
	(with vehicle used 3 months - 1 year experience for mission)	(6 Points)	
	1 week -3 months experience	(8 Points)	
	<1 week driving experience	(30 Points)	
	Not licensed for vehicle type	(70 Points)	
Senior Occupant:	E5 or below	(4 Points)	
	E6-E7, O1-O2	(2 Points)	
Vehicle Condition:	PMCS not conducted	(40 Points)	
	Maintenance Overdue	(40 Points)	
	3-Point Belts not Available for all Occupants	(10 Points)	
Weather Condition:	Snow/Fog (Expected)	(8 Points)	
	High Winds/Heavy Rain (Expected)	(4 Points)	
	No experience driving in expected conditions	(10 Points)	
Route:	Not Familiar with Route/No strip map	(6 Points)	
	Not Familiar with Route/Strip map Available	(3 Points)	
	Mainly Secondary Roads	(4 Points)	
Travel Time:	Expected Travel Time >6 hours	(12 Points)	
	Expected Travel Time 3-6 hours	(8 Points)	
	Expected Travel Time 1-3 hours	(4 Points)	
INITIAL RISK:	(Add all circled points)		Points

Implemented Controls

Attended Defensive Driving Course	(-20 Points)
Attended Accident Avoidance Course	(-20 Points)
Counseling by 1st Line Supervisor	(-12 Points)
Counseling by Commander/1SGT	(-16 Points)

RESIDUAL RISK: (Subtract circled points from total above) _____ Points

Risk Approval Authority Levels

Extremely High > 60 Points Negligible < 30 Points	High 50-59 Points	Moderate 40-49 Points	Low 30-39 Points
General Officer Approval	O6 Approval	O5 Approval	O3 Approval
Supervisor Approval			

APPROVED: _____
(Printed Name) (Grade) (Signature)

(Attachment 1)

VEHICLE SAFETY DURING PASS AND LEAVE PERIODS

1. Reference the HQ USAREUR/7A Safety Division website at <http://www.per.hqusareur.army.mil/services/safetydivision/main.htm>.
2. The safety of our soldiers both on and off duty is vital to mission accomplishment. Off-duty vehicle accidents are the primary threat to our soldiers. To counter this threat, leaders at all echelons must give special attention to "high-risk and extremely high-risk" soldiers, specifically during off-duty periods. When reviewing requests for normal and extended weekend passes, commanders will do the following:
 - a. Raise awareness of the "at-risk" population, geographic areas, and roadways where increased incidents occur. Include local road-safety risks as a topic for all incoming soldiers within 30 days after they arrive. This applies regardless of whether or not the soldier has a POV driver's license.
 - b. Require soldiers, in conjunction with their first-line leaders, to complete the Driver's Risk Awareness Questionnaire on the Safety Division website. This will help the commander identify those who meet the definition of "high-risk and extremely high-risk." This is a one-time requirement for each soldier unless the leadership believes that a reevaluation is appropriate.
 - c. Require soldiers identified as "high-risk and extremely high-risk" to complete the Off-Duty Risk Assessment on the Safety Division website and give it to their commander when they are planning to use a POV, rental vehicle, or borrowed vehicle to travel outside the community in which they live. The soldier's chain of command must review the assessment; consider the travel distance, duration, and mode; and approve or disapprove the request based on the determined risk levels.
 - d. Use countermeasures to reduce or eliminate the risk associated with soldier travel plans.

(Encl 5)